

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MYRNA LUZ RIVERA GARCIA

DEBTOR

CASE NO. 14-07925-ESL

CHAPTER 13

DEBTOR'S REPLY TO *MOTION TO DISMISS*, DOCKET #52

TO THE HONORABLE COURT:

COMES NOW, MYRNA LUZ RIVERA GARCIA, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 23, 2015, Cooperativa Ahorro y Credito Jesus Obrero ("CJO") filed a *Motion to Dismiss*, docket #52, basically alleging that the debtor has failed to make five (5) direct post-petition car loan payments to said secured creditor.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she is up-to-date with the direct post-petition car loan payments to CJO.

3. The debtor submits that the five (5) post-petition payments above mentioned are included in Proof of Claim 3-3 filed on March 20, 2015 by CJO.

4. Furthermore, the debtor submits that secured arrears with CJO (POC 3-3) are provided to be paid through proposed modified Plan dated December 4, 2015, docket #54, which is favorably recommended by the Trustee, docket #55.

WHEREFORE, debtor respectfully requests this Honorable Court deny *Motion to Dismiss*, docket #52, filed by CJO, in above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee and to

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Debtor's Reply to Motion to Dismiss
Case no. 13-02505-ESL13

Briseida Y. Delgado Miranda, Esq., attorney for CJO. I also certify that a copy of this motion was sent via US Mail to debtor to her address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 24th day of December, 2015.

/s/Roberto Figueroa Carrasquillo
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